NORTH CAROLINA DIVISION OF AIR QUALITY

Air Permit Review

Permit Issue Date: INSERT DATE

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100868
Inspector's Name: Taylor Hartsfield
Date of Last Inspection: 06/10/2015
Compliance Code: 3 / Compliance - inspection

Facility Data

Applicant (Facility's Name): The Sherwin - Williams Company - Stagecoach Trail

Facility Address:
The Sherwin - Williams Company - Stagecoach Trail
113 Stagecoach Trail
Greensboro, NC 27409

SIC: 2851 / Paints And Allied Products
NAICS: 32551 / Paint and Coating Manufacturing

Facility Classification: Before: Title V **After:** Title V
Fee Classification: Before: Title V **After:** Title V

Permit Applicability (this application only)

SIP: 15A NCAC 02D .0515, .0521, .0958, .1100, .1111, .1806, 02Q .0317, .0711
NSPS:
NESHAP:
PSD:
PSD Avoidance:
NC Toxics:
112(r):
Other: Renewal of Title V permit.

Contact Data

Facility Contact	Authorized Contact	Technical Contact
Justin Sergent Safety & Environmental Manager (336) 312-9764 1025 Howard Street Greensboro, NC 27403	James Kelley Area Director Operations (336) 550-1619 113 Stagecoach Trail Greensboro, NC 27409	Justin Sergent Safety & Environmental Manager (336) 312-9764 1025 Howard Street Greensboro, NC 27403

Application Data

Application Number: 4100868.16A and .16B
Date Received: 01/21/2016
Application Type: Combined Renewal with Minor Modification
Application Schedule: TV-Renewal

Existing Permit Data
Existing Permit Number: 05755/T18
Existing Permit Issue Date: 11/14/2011
Existing Permit Expiration Date: 10/31/2016

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	---	0.5600	78.23	0.4700	0.5300	11.67	4.49 [Toluene]
2013	---	0.5100	90.58	0.4300	0.5500	12.55	4.83 [Toluene]
2012	---	0.3400	85.52	0.2800	0.4800	11.27	4.60 [Toluene]
2011	---	0.3300	73.12	0.2800	0.4400	9.72	4.16 [Toluene]
2010	---	0.3800	70.47	0.3200	0.4400	9.00	3.98 [Toluene]

Review Engineer: Charles F. Yirka

Review Engineer's Signature: **Date:** INSERT DATE

Comments / Recommendations:
Issue 05755/T19
Permit Issue Date: INSERT DATE
Permit Expiration Date: INSERT DATE

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I. Purpose of Application

This permitting action is two-fold. First, for the primary purpose for the TV renewal. The renewal application was submitted timely on January 20, 2016 on or before 9 months of expiration. Second and in addition, a minor modification of an existing Title V permit pursuant to 02Q .0515 at the same time. The minor application was submitted for changes to the permit to bring it up to date.

II. Facility Description

The facility is a manufacturer of lacquers and furniture finishing materials for the office furniture manufacturing industry.

III. History/Background/Application Chronology

June 10, 2015 – Taylor Hartsfield of the WSRO completed the annual inspection of the facility.

January 20, 2016 – Receipt date of the application. This application was submitted for a combined renewal and a minor modification. Application was split into a minor modification .16A and renewal application .16B.

January 25, 2016 – Completeness letter issued for renewal application .16B the application was deemed complete and assigned to Mr. Kevin Godwin.

February 2, 2016 – A completeness letter was issued indicating that the application .16A was incomplete and the proposed changes could not be made until the requested material was received. Additional fee (the applicant submitted $918 for the application fee for the minor modification; the required fee was $922) and additional information was requested.

February 5, 2016 – WSRO provided comments on the renewal application 4100868.16B

February 15, 2016 – The applicant submitted the remaining $4 fee and additional information and the application deemed complete for processing.

February 24, 2016 – This engineer contacted Justin Sergent, Manager of Safety and Compliance, for clarification of the proposed changes.

March 7, 2016 – Draft permit sent to the applicant for review and clarification of requested changes.

March 30, 2016 – Draft permit with comments and letter was received from the applicant.

April 8, 2015 – Draft permit corrected and again sent to the applicant for further review and clarification of requested changes.

April 12, 2015 - Applicant provided email indicating they had no further comments and the minor permit application could be combined with the renewal.

April 13, 2015 – Application for minor modification .16A consolidated into renewal application .16B. Reassigned renewal application .16B from Mr. Godwin to me. Draft permit sent for comments sent to applicant, supervisor and SSCB.

April 14, 2016 – Comments received on draft permit from supervisor.

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April 18, 2016 – Revised draft permit sent to supervisor, regional office, SSCB and Permittee for review prior to issuance.

April 27, 2016 – Comments received from Permittee indicating no additional comments.

April 29, 2016 – Comments received from supervisor.

INSERT DATE – Concurrent public notice and EPA review began.

INSERT DATE – Public notice period over.

INSERT DATE – EPA review period over.

INSERT DATE – Permit issued.

IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of this minor modification:

Page	Section	Description of Change
Attachment	Insignificant Activities	-updated the list of insignificant activities including the removal of one diesel-fired emergency generator (152 Hp) that was a GACT affected source (ZZZZ)
Cover	-	-amended dates and permit revision numbers
All	Header	-amended permit revision number
4 - 5	Equipment table	-made corrections to the descriptions in the table including: 1. Removed emissions source HBL2 (one high/low mixer – 660 gallon capacity) from source list as it will now be included with the dispersers. HLM2 is now changed to SB-3 and is included as one of the thirty five dispersers (30 HP or less each). 2. The list of thin and shade tanks was corrected to indicate there are now twenty-two thin and shade tanks and not twenty six. 3. Removed the thirty five dispersers (30 HP or less each, designed for use with portable mixing tanks) from the source list as uncontrolled sources and moved them by associating them with the controlled sources; the portable mixing tanks. (Note that source HML2 which was changed to SB-3 is included as one of the thirty five dispersers SB-1 to SB-35). 4. Associate existing control device I.D. No. CDUV1 which controls air emissions during mixing activities with the 35 dispersers used with portable tanks.
6	2.1 A	Removed the thirty five dispersers from the list of sources.

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Page	Section	Description of Change
8	2.1 B	-made corrections to the controlled source list as follows: 1. Removed the high/low mixer HLM2. 2. Corrected the shade tank list. 4. Removed the portable mixing tanks.
9	2.1 B.1. a and c	-corrected affected sources listed in 02D .0515 in the associated monitoring and recordkeeping.
10	2.1 B. 2 a and c	-corrected affected sources listed in 02D .0521 in the associated monitoring and recordkeeping.
15	2.2 A.6	-corrected affected sources listed in 02D .1111 (MACT 7C).
18-27	General Conditions	-updated general conditions (v4.0 12/17/15) and list of acronyms

The above changes were made to the TVEE as part of this permit modification and approved by Ms. Jenny Sheppard on 04/18/2016.

V. Regulatory Review

The facility is currently subject to the following regulations:
15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes
15A NCAC 02D .0521, Control of Visible Emissions
15A NCAC 02D .0958, Work Practices for Sources of Volatile Organic Compounds
15A NCAC 02D .1100, Control of Toxic Air Pollutants
15A NCAC 02D .1111, Maximum Achievable Control Technology (40 CFR 63 Subparts ZZZZ and CCCCCCC)
15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions
15A NCAC 02Q .0317, Avoidance Conditions (15A NCAC 02D .1111, Maximum Achievable Control Technology)
15A NCAC 02Q .0711, Emission Rates Requiring a Permit

A regulatory review for these existing requirements will not be included in this document. No additional regulations will apply and no additional sources were added to the permit. Sources were only removed. As such the facility will no longer be subject to the GACT-Subpart ZZZZ since the affected source was removed from the facility.

The application indicates a modification was made for the following:

- Addition of one (1) Rotor Stator In-line Mixer

This engineer requested additional information and also followed up by questioning the applicant on February 24, 2016 via telephone regarding what standards and where this source should appear in the permit as it appeared it might be one of the eight high speed mixers that are affected by the GACT - 40 CFR 63 Subpart CCCCCCC. The applicant indicated, however, this is not one of the group of high speed mixers and, as indicated in the application, there are no emissions, therefore, this equipment was not added to the list of sources nor required to be added to the permit.

The applicant also requested various emissions sources be removed from the insignificant activities list and the permit and emission source descriptions be revised for accuracy. The applicant proposed the existing bagfilter **(ID No. CDUV1)**, now controlling emission from the existing MACT CCCCCCC (GACT) affected emission sources listed as Portable Mixing Tanks to be associated with the Dispersers. The Dispersers were listed in the permit as not being controlled. The applicant

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indicated this will not affect the GACT applicability, e.g., bagfilter testing as this description was only changed to reflect existing conditions. Changes are indicated by highlighting and strikethrough:

Emission Source I.D. No.	Emission Source Description	Control Device I.D. No.	Control Device Description
~~HLM2~~ ~~**[GACT, Subpart CCCCCCC]**~~	~~One high/low mixer (660 gallon capacity)~~	~~CD1~~	~~One cartridge-type bagfilter (6,000 square feet of filter area)~~
FT1through FT4	Four fill tubs (100 gallon capacity each)	NA	NA
~~T&S3~~, ~~T&S4 and~~ T&S9 T&S12 and T&S13, and T&S23 ~~T&S30~~ T&S27, T&S28, and T&S29 T&S25 T&S21 and T&S22 T&S15 and T&S24 T&S14, T&S16, and T&S17 T&S26 ~~T&S31~~ T&S32 and T&S33 T&S34 and T&S35 T&S36 and T&S37 **[GACT, Subpart CCCCCCC]**	~~Twenty-six~~ Twenty-two thin and shade (T&S) tanks as follows: ~~Three~~ One 660 gallon capacity Three 1,100 gallon capacity ~~One 1,200 gallon capacity~~ Three 1,400 gallon capacity One 2,000 gallon capacity Two 2,200 gallon capacity Two 3,000 gallon capacity Three 4,000 gallon capacity One 6,500 gallon capacity ~~One 6,800 gallon capacity~~ Two 5,000 gallon capacity Two 3,000 gallon capacity Two 3,000 gallon capacity	CD1	One cartridge-type bagfilter (6,000 square feet of filter area)
UVT1 and UVT2 UVT3 and UVT4 **[GACT, Subpart CCCCCCC]**	Ultraviolet light curable paint manufacturing operations and processes consisting of the following: Two blending tanks (250 gallon capacity each) Two blending tanks (500 gallon capacity each)	CDUV1	One bagfilter (3,000 square feet of filter area)

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Emission Source I.D. No.	Emission Source Description	Control Device I.D. No.	Control Device Description
PM31 PM81 and PM82 PM101, PM102, PM103, PM104, PM107, PM108, and PM109 PM131 and PM132 PM181, PM182, PM183, PM184, and PM185 PM258 and PM259 PM301, PM302, PM303, and PM304 PM351 PM&T1 PM251 PM305 **[GACT, Subpart CCCCCCC]**	Portable mixing tanks with thirty-five dispersers (30 horsepower or less each; Nos. SB-1 through SB-35) designed for use with portable mixing tanks as follows: One 30 gallon capacity Two 80 gallon capacity Seven 100 gallon capacity Two 130 gallon capacity Five 180 gallon capacity Two 250 gallon capacity Four 300 gallon capacity One 350 gallon capacity One 235 gallon capacity (mix and thin) One 250 gallon capacity One 300 gallon capacity	CDUV1	One bagfilter (3,000 square feet of filter area)
DSSB1	One spray booth	NA	NA
~~SB1/2HP1 through SB1/2HP10, SB3/4HP1 through SB3/4HP10, SB3HP1 through SB3HP10, and SB15HP6 through SB15HP10~~	~~Thirty-five dispersers (30 horsepower or less each)~~	~~NA~~	~~NA~~
ES-IPT1 ~~and~~ ES-IPT2	Intermediate storage tanks as follows: ~~Two~~ One 3,000 gallon capacity One 2,000 gallon capacity	NA	NA

The applicant also requested the following various insignificant activities be removed and added to the insignificant activities list as indicated by strikethrough and highlighting:

Emission Source ID	Source Description
IES-STILL	One batch type solvent distillation unit
~~IES-RDSH1 IES-RDSH2~~	~~Two heaters~~
IES-RDO401, IES-RDO201, IES-RDO202, IES-RDO203, IES-RDO204, and IES-QAQCOBM01	Six Blue M ovens
~~IES-RDO2401~~	~~One UV oven~~
IES-RDH901 IES-RDH902	Two hoods

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Emission Source ID	Source Description
IES-RDCC1 ~~IES-RDCC2~~	~~Two~~ One curtain coater~~s~~
IES-RDRC1	One roller coater
IES-RDWT1 through IES-RDWT3	Three solvent wash tanks
IES-RDOP01, IES-QAQCOP01, and IES-QAQCOP02	Three precision ovens
IES-RDHSD1 **[GACT, Subpart CCCCCCC]**	One HSD mixer
IES-RDCOM1 **[GACT, Subpart CCCCCCC]**	One continuous media (COM) mill
IES-RDM2 **[GACT, Subpart CCCCCCC]**	One dual motor Myers
IES-RDSB2 IES-RDSB3	Two spray booths
~~IES-RD1~~	~~One ventilation unit~~
~~IES-RDWH1~~	~~One water heater~~
IES-QAQCH01	One lab hood
IES-QAQC1	One low level lab exhaust
IES-QAQCOG01	One grieve oven
IES-DX41 IES-DX61	Two Baxter ovens
IES-QAQCHSD2 **[GACT, Subpart CCCCCCC]**	One Eiger COM
IES-BF-2	One bagfilter (236 square feet of filter area) installed on exempt equipment
IES-SB-1 IES-SB-2	Two dry filter type spray booths used for quality control
IES-RDAM1 through IES-RDAM3 **[GACT, Subpart CCCCCCC]**	Three air mixers
IES-DSSB2 IES-DSSB3	Two spray booths
~~IES-DS01~~	~~One 0.8 million Btu per hour natural gas-fired oven~~
IES-DS02	One electric oven
~~IES-B1~~	~~One natural gas-fired comfort heat boiler~~
IES-PSB	Powder coating spray booth
IES-PO	Powder coating curing oven
IES-RMWHH1 **[GACT, Subpart CCCCCCC]**	Pre-batch weigh station hood
IES-DSAM1 through IES-DSAM6 **[GACT, Subpart CCCCCCC]**	Six air mixers
IES-QAQCWT1 IES-QAQCWT2	Two solvent wash tanks
IES-UVQAQCR1	UV reactor
IES-UVQAQCSB1	UV spray booth
IES-UVQAQCO1	UV oven
IES-UVQAQCWT1	Solvent wash tank
IES-RDUVSB1	UV spray booth

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Emission Source ID	Source Description
IES-RDO205 IES-RDO402	Two Blue M ovens
IES-RDOG01	Giardina drying tunnel
IES-RDOP02	Precision oven
IES-RDGC1	Gas chromatograph
IES-RDAM4 through IES-RDAM26 **[GACT, Subpart CCCCCCC]**	Twenty-three air mixers
~~IES-EG1 **[GACT, Subpart ZZZZ]**[3]~~	~~One diesel-fired emergency generator (152 Hp)~~
IES-QAQCAM1 through IES-QAQCAM3 **[GACT, Subpart CCCCCCC]**	Three air mixers
IES-RDSH1 IES-RDSH11	Eleven Heaters
IES-RDFC1	Flooring coater
IES-RDMCUVC1	Moulding coater followed by curing with UV coater
IES-RDCVC1	Cefla Vacuum Coater
IES-RDCACAF1	Cefla Aquadry Oven and Cefla Laminar Flow
IES-RDGRC1 IES-RDGRC2	Two Giardina Roll Coaters
IES-RDSRC1 IES-RDSRC2	Two Sorbini Roll Coaters
IES-RDSLFS1	Superfici Flat Line Sprayer (Compact Sprayer)
IES-UVQAQCR2	UV Reactor
IES-DSSB4	Spray Booth
IES-RDPG01	Pregel Oven
IES-RDUVP01	UV Processor
IES-B2	Natural gas-fired comfort boiler
IES-SFWS1	Superfici Sander
IES-CWS1	Costa Sander
IES-TS1	Small table sander
IES-VWR	VWR Hot Plate, Barnstead/Thermolyne 62700 Furnace, Perkin Elmer AAnalyist 200/400, FIMS 100 Mercury Analysis System

VI. Compliance Statement

On May 16, 2013 the facility received a Notice of Deficiency for a late quarterly report.

The last Annual Compliance Certification was submitted for CY2015 on January 29, 2016. The facility experienced no deviations for CY2015.

On June 10, 2015 the facility was inspected by Mr. Taylor Hartsfield of the WSRO. Mr. Hartsfield stated that the facility appeared to be operating in compliance with all permit requirements.

VII. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The Permittee is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

NESHAPS/MACT/112j – The Permittee currently operates under a facility-wide Maximum Achievable Control Technology standards avoidance condition. This condition limits emissions of

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any single hazardous air pollutant (HAP) to less than 10 tons per year and to less than 25 tons per year for any combination of HAPs. The Permittee is required to calculate and record monthly HAP emissions using consumption records of all HAP-containing materials. Semi-annual reporting is required. The facility is classified as a Title III minor (by virtue of permit restrictions). The Permittee requested the existing diesel-fired emergency generator (152 HP; **ID No. IES-EG1**) that was subject to the GACT - 40 CFR 63, Subpart ZZZZ be removed from the insignificant activities list as it was removed from the facility, therefore, this standard will no longer apply. 40 CFR 63, Subpart CCCCCCC will continue to apply to various sources as indicated in the permit. Continued compliance is expected.

PSD – The Permittee is not currently subject to any Prevention of Significant Deterioration requirements. This permit modification does not affect this status. Guilford County has triggered the PSD minor source baseline dates for PM10 and SO2. However, it can be seen from the emissions inventory there are no SO2 emissions and emissions of PM10 are insignificant and there are no changes proposed that would result in a quantifiable actual emissions increase or decrease of these pollutants associated with this modification.

112(r) – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit modification does not affect this status.

CAM – 40 CFR 64 requires that a continuous assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The first CAM review was when the permit was renewed on January 3, 2007. CAM was found not to be applicable at that time (see Ken Babb's permit review – 05755T15). CAM was again reviewed when the permit was renewed on November 14, 2011 (see Mark Cuilla's review- 05755/T17. CAM was determined to not be applicable at this time based on the last permit renewals. In addition, this application for the Title V renewal indicates CAM will continue to not apply. This permit modification does not affect this status.

VIII. Facility Wide Air Toxics

The Permittee is currently subject to modeled emission rates for methyl ethyl ketone on a source-by-source basis per 15A NCAC 02D .1100. To ensure compliance with the emission limits, the Permittee is required to limit the facility's production rate to less than 65,000 gallons of coating material per day. Daily recordkeeping and quarterly reporting are required by the current air permit. This permit modification does not affect this status, therefore, there are no adverse impacts to human health.

IX. Facility Emissions Review

There appears to be no quantifiable change in emissions due to this permit modification. See the emissions inventory information on Page 1 of this review.

X. Stipulation Review

The facility was last inspected by Taylor Hartsfield of the WSRO on June 10, 2015. At that time, the facility appeared to be in compliance with the permit and applicable DAQ regulations. The WSRO provided comments on the application all comments were addressed.

XI. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit will be made available pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the

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public notice will be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522 the proposed permit and final permit pursuant will be provided to EPA.

Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit will be provided to each affected State at or before the time notice provided to the public under 02Q .0521 above.

The Public Notice period was over on **INSERT DATE** and EPA Review period was over on **INSERT DATE**. The following comments were received from the EPA, the public and/or affected states and DAQ responses follow.

INSERT COMMENTS AND RESPONSES HERE

XII. Conclusions, Comments, and Recommendations

- A professional engineer's seal was not required for this renewal.
- A consistency determination was provided for this renewal.
- WSRO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

RCO concurs with WSRO's recommendation to issue the modified air permit.

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